

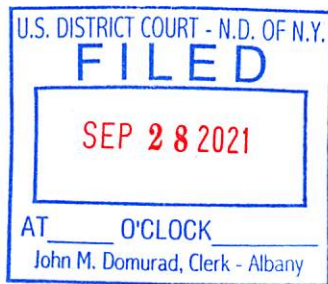
IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ROBERT J. INGRAO a/k/a "Bobby,"  
RICHARD SINDE a/k/a "Richie,"

Defendants.



) Criminal No. 1:21-CR-343 (MAD)

) Indictment

) Violations: 21 U.S.C. §§ 846, 841(a)(1),  
) 841(b)(1)(A)  
) [Conspiracy to Distribute and  
) Possess with Intent to  
) Distribute a Controlled  
) Substance]

) 21 U.S.C. § 841(a)(1),  
) 841(b)(1)(A);  
) 18 U.S.C. § 2  
) [Possession with Intent to  
) Distribute a Controlled  
) Substance]

) 2 Counts & Forfeiture Allegation

) Counties of Greene & Schenectady  
) Offense:

**THE GRAND JURY CHARGES:**

**COUNT 1**

**[Conspiracy to Distribute and Possess with Intent to Distribute a  
Controlled Substance (Cocaine)]**

Between on or about March 29, 2021 through April 3, 2021, in Schenectady and Greene Counties in the Northern District of New York, and elsewhere, the defendants, **ROBERT J. INGRAO a/k/a "Bobby,"** and **RICHARD SINDE a/k/a "Richie,"** conspired to knowingly and intentionally distribute and possess with intent to distribute a controlled substance, in violation of 21 U.S.C. §§ 841(a) and 846. As to **ROBERT J. INGRAO a/k/a "Bobby,"** and **RICHARD SINDE a/k/a "Richie,"** that violation involved 5 kilograms or more of a mixture and substance

containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

## **COUNT 2**

### **[Possession with Intent to Distribute a Controlled Substance (Cocaine)]**

On or about April 2, 2021, in Greene County in the Northern District of New York, and elsewhere, the defendants, **ROBERT J. INGRAO a/k/a “Bobby,”** and **RICHARD SINDE a/k/a “Richie,”** knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2. As to **ROBERT J. INGRAO a/k/a “Bobby,”** and **RICHARD SINDE a/k/a “Richie,”** that violation involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

### **Forfeiture Allegation**

The allegations contained in Count One of this indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and 846, the defendant **RICHARD SINDE a/k/a “Richie”** shall forfeit to the United States of America any property constituting, and derived from, any proceeds obtained, directly and indirectly, as the result of such offense, and any property used, and intended to be used, in any manner and part, to commit and to facilitate the commission of, the offense.

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The property to be forfeited includes approximately \$33,059 in United States currency seized from the Fort Lee, New Jersey residence of **RICHARD SINDE a/k/a "Richie"** on May 11, 2021.

Dated: September 28, 2021


\*\*\*REDACTED\*\*\*

A TRUE BILL,

Grand Jury Foreperson

ANTOINETTE T. BACON  
Acting United States Attorney

By:

  
Michael Barnett  
Assistant United States Attorney  
Bar Roll No. 519140